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7  
8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE DISTRICT OF NEVADA**

10 FRANCISCA T. SALAZAR, an individual,  
11  
12 Plaintiff,

CASE NO. 2:19-cv-02225-RFB-BNW

13 v.

14 C. R. BARD, INC., a New Jersey corporation;  
15 BARD PERIPHERAL VASCULAR, INC., an  
Arizona corporation, and DOES 1 through 10,  
16  
17 Defendants.

18  
19 **STIPULATION AND ORDER TO STAY CASE**

20 The parties, Plaintiff FRANCISCA T. SALAZAR and Defendants, C. R. Bard, Inc.  
21 and Bard Peripheral Vascular, Inc. (“Bard”), by and through their undersigned counsel,  
22 hereby stipulate as follows pursuant to Fed. R. Civ. P. 15(a)(2):

23 WHEREAS, Plaintiff’s counsel represents approximately 400 plaintiffs with cases  
24 proceeding in this and other courts across the country asserting similar claims against  
25 Defendants for injuries they contend arise out of their use of Defendants’ IVC filters; and

26 WHEREAS, Plaintiff’s counsel and Defendants have begun discussions in an attempt  
27 to achieve a global settlement of the cases and claims of the plaintiffs represented by  
28 Plaintiff’s counsel; and

1 WHEREAS, Defendants have retained a dedicated settlement counsel for these  
2 discussions which has successfully resolved thousands of similar cases with other counsel  
3 representing similar plaintiffs;

4 WHEREAS, Plaintiff's counsel has extensive experience in IVC filter litigation both  
5 prior to and in the course of the MDL; and

6 WHEREAS, based on all the facts and circumstances, including, but not limited to,  
7 the prior success of Defendants' settlement counsel in resolving similar cases and Plaintiff's  
8 counsel's experience with Defendants in prior IVC filter litigation, Plaintiff's counsel  
9 believes that there is a good likelihood that the global settlement talks with Defendants will  
10 be successful; and

11 WHEREAS, as part of the agreement to engage in global settlement discussions,  
12 Plaintiff's counsel and Defendants have agreed that all activity in all of the Plaintiff's  
13 counsel's IVC filter cases should "stand-down" for 60 days so that the Parties may focus their  
14 attention on their settlement efforts; and

15 WHEREAS, the ongoing national emergency surrounding the Covid-19 pandemic  
16 have heightened the need for all parties to conserve their resources as much as possible;

17 IT IS STIPULATED AND AGREED BY THE PARTIES that all activity in this case  
18 shall be stayed through and including **June 26, 2020**.

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1 IT IS FURTHER STIPULATED AND AGREED BY THE PARTIES that the  
2 deadline to file Defendants' responsive pleading, currently set for **May 10, 2020** should be  
3 continued to **July 9, 2020**;

4 RESPECTFULLY submitted this 30<sup>th</sup> day of April 2020.

5 NETTLES MORRIS

GREENBERG TRAURIG, LLP

6  
7 By: /s/ Brian D. Nettles  
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14 ***Counsel for Plaintiff***

By: /s/ Eric W. Swanis  
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***Counsel for Defendants***


### 13 ORDER

14 The Court, having reviewed the stipulation of the Parties, and good cause appearing  
15 therefore:

16 IT IS HEREBY ORDERED ADJUDGED AND DECREED that all activity in this  
17 case shall be stayed through and including **June 26, 2020**.

18 IT IS FURTHER HEREBY ORDERED ADJUDGED AND DECREED that the  
19 deadline to file Defendants' responsive pleading, currently set for **May 10, 2020** should be  
20 continued to **July 9, 2020**.

21 IT IS SO ORDERED.

22  
23   
24 RICHARD F. BOULWARE, II  
25 UNITED STATES DISTRICT JUDGE

26 DATED this 17th day of June, 2020.

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**CERTIFICATE OF SERVICE**

I hereby certify that on **April 30, 2020**, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

/s/ Evelyn Escobar-Gaddi  
An employee of GREENBERG TRAURIG, LLP

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